

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
SHONDALE GAMBLE,

Plaintiff,

-against-

LIDER TRANSPORT LLC and VICTOR MARTINEZ-
PROANO,

Defendants.
-----X

Index no.

Date filed:

SUMMONS

Basis of venue: Residence of
Plaintiff in Kings County

Plaintiff's Address: 724 Egan
Street, Brooklyn, NY 11239

TO THE ABOVE NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your answer on the Plaintiff's Attorney within twenty (20) days after the service of this Summons, exclusive of the day of service of this Summons, or within thirty (30) days after the service of this Summons is complete if this Summons is not personally delivered to you within the State of New York. In case of your failure to appear to answer, judgment will be taken against you by default for the relief demanded in the complaint, together with the costs of this action.

Dated: April 20, 2022

Evans D. Prieston, Esq.

By: Evans D. Prieston, Esq.
LAW OFFICE OF EVANS D. PRIESTON, P.C.
Attorney for Plaintiff
47-40 21st Street, 10th Fl. Ste-C
Long Island City, NY 11101
(718) 424-244

ADDRESSEES OF DEFENDANTS:

LIDER TRANSPORT LLC., 292 Mountain Avenue, North Plainfield, NJ 07060

VICTOR MARTINEZ-PROANO, 310 Rockaway Avenue, Piscataway, NJ 08854

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X Index no.
SHONDALE GAMBLE,

Plaintiff,

VERIFIED COMPLAINT

-against-

LIDER TRANSPORT LLC and VICTOR MARTINEZ-PROANO,

Defendants.

-----X
Plaintiff, SHONDALE GAMBLE, by her attorneys, LAW OFFICE OF EVANS D. PRIESTON, P.C., complaining of the Defendants, alleges the following, as and for her Complaint:

1. At all relevant times, Plaintiff, SHONDALE GAMBLE, resided in the County of Kings, City and State of New York.
2. Upon information and belief, at all relevant times, defendant LIDER TRANSPORT LLC, (hereinafter "LIDER"), was a foreign limited liability company, duly authorized to conduct business in the State of New York.
3. Upon information and belief, at all relevant times, defendant VICTOR MARTINEZ-PROANO, (hereinafter "VICTOR"), resided in the County of Middlesex, State of New Jersey.
4. On March 15, 2021, Defendant, LIDER, was the owner of the 2012 Freightliner bearing New Jersey plate no. AW893M.
5. On March 15, 2021, Defendant, LIDER, was the lessee of the 2012 Freightliner bearing New Jersey plate no. AW893M.
6. On March 15, 2021, Defendant, LIDER, maintained the 2012 Freightliner bearing New Jersey plate no. AW893M.

7. On March 15, 2021, Defendant, LIDER, controlled the 2012 Freightliner bearing New Jersey plate no. AW893M.

8. On March 15, 2021, Defendant, LIDER, managed the 2012 Freightliner bearing New Jersey plate no. AW893M.

9. On March 15, 2021, Defendant, VICTOR, was the operator of the 2012 Freightliner bearing New Jersey plate no. AW893M.

10. On March 15, 2021, Defendant, VICTOR, maintained the 2012 Freightliner bearing New Jersey plate no. AW893M.

11. On March 15, 2021, Defendant, VICTOR, controlled the 2012 Freightliner bearing New Jersey plate no. AW893M.

12. On March 15, 2021, Defendant, VICTOR, managed the 2012 Freightliner bearing New Jersey plate no. AW893M.

13. On March 15, 2021, defendant LIDER offered services to the residents of the State of New York.

14. Upon information and belief, on March 15, 2021, defendant LIDER employed defendant, VICTOR.

15. Upon information and belief, on March 15, 2021, defendant, VICTOR, operated and controlled the aforementioned motor vehicle in the course of employment with defendant LIDER.

16. Upon information and belief, on March 15, 2021, defendant, VICTOR, operated and controlled the aforementioned motor vehicle for the benefit of defendant LIDER.

17. Upon information and belief, on March 15, 2021, defendant, VICTOR, was an agent of defendant LIDER.

18. As a result, defendant LIDER, as the principal and/or employer of defendant VICTOR, its agent and/or employee, is liable to plaintiff for the acts and omissions committed by defendant VICTOR, under the doctrines of respondeant superior and/or agency.

19. At all relevant times, the Verrazano Bridge, in the County of Richmond, City, and State of New York, was and still is a public roadway, in common use by the residents of the City and State of New York and others.

20. On March 15, 2021, Plaintiff, SHONDALE GAMBLE, was a passenger in the 2018 Nissan motor vehicle bearing New York plate no. HXZ7890.

AS AND FOR THE FIRST CAUSE OF ACTION

21. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 20 inclusive, with the same force and effect as though set forth at length herein.

22. On March 15, 2021, at 5:40 am, , the vehicle owned by Defendant LIDER and operated by Defendant VICTOR, came in contact with the vehicle Plaintiff was a passenger in, at the aforesaid location.

23. At all relevant times, Defendants were solely responsible for the proper and prudent ownership, operation, management, maintenance, and control of their respective vehicle.

24. The aforesaid occurrence was caused wholly and solely by reason of the carelessness, recklessness and negligence of Defendants in the ownership, operation, maintenance, management, and control of their respective vehicle, without any negligence on the part of Plaintiff contributing thereto.

25. As a result of the aforesaid occurrence, Plaintiff SHONDALE GAMBLE was rendered sick, sore, lame, and disabled and have remained so since said occurrence. She sustained nervous shock and continue to suffer mental anguish and great physical pain. She will be compelled

to undergo medical aid, treatment, and attention and to expend money and incur obligations for physician's services, medical and hospital expenses for the care and treatment of her injuries; and upon information and belief, she will be compelled to expend additional sums of money and incur further obligations in the future for additional physician's services, medical and hospital expenses for the further care and treatment of her injuries. She has been incapacitated from attending to her usual duties, functions, occupations, vacations and avocations, and in other ways she has damages, and upon information and belief, may be so incapacitated in the future and will suffer pecuniary losses.

26. As a result of the aforesaid occurrence, Plaintiff suffered serious personal injuries.

27. Plaintiff sustained serious injuries as defined in §§ 5102 and 5104 of the Insurance Law of the State of New York.

28. Upon information and belief, this action falls within one or more of the exceptions set forth in CPLR 1601.

29. By reason thereof, Plaintiff has been damaged in an amount greater than the jurisdictional limits of the lower Courts of the State of New York.

WHEREFORE, Plaintiff demands judgment against Defendants, and each of them, jointly and severally, in an amount greater than the jurisdictional limits of the lower Court of the State of New York, together with costs and disbursements.

Dated: Long Island City, NY

April 20, 2022

Yours, etc.

Evans D. Prieston, Esq.

Evans D. Prieston, Esq.
LAW OFFICE OF EVANS D. PRIESTON, P.C.
Attorney for Plaintiff
47-40 21st Street, 10th Fl. Ste-C
Long Island City, NY 11101
(718) 424-2444

INDIVIDUAL VERIFICATION

STATE OF NEW YORK

)ss.:

COUNTY OF QUEENS

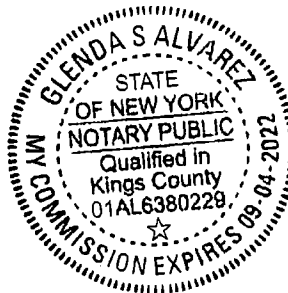
I, Shondale Gamble, am the Plaintiff in the within matter. I have read the foregoing **SUMMONS AND COMPLAINT** and know the contents thereof. The contents are true to my own knowledge except as to matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

S. Gamble
Claimant Signature

Sworn to before me on this

20 day of April 2022

[Signature]
Notary Public



Index No.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
SHONDALE GAMBLE,

Plaintiff,

-against-

LIDER TRANSPORT LLC and VICTOR MARTINEZ-
PROANO,

Defendants.
-----X

VERIFIED SUMMONS and VERIFIED COMPLAINT

Signature (Rule 130-1.1-a)

Evans D. Prieston, Esq.

Evans D. Prieston, Esq.

LAW OFFICE OF EVANS D PRIESTON, P.C.

Attorneys for Plaintiff

47-40 21st Street, 10th Floor, Suite-C

Long Island City, NY 11101

(718) 424-2444